

## **REMARKS**

### **I. INTRODUCTION**

Claims 1, 10, 15, and 16 have been amended. The specification has also been amended. Support for the claim amendments can be found at least at ¶ [0019] of the published application. Thus, claims 1-16 remain pending in the present application. No new matter has been added. In light of the above amendments and the following remarks, Applicant respectfully submits that all presently pending claims are in condition for allowance.

### **II. INFORMATION DISCLOSURE STATEMENT**

The Examiner has requested a copy of foreign cited reference FR2169457. A copy of this reference, including an English abstract, has been enclosed herewith.

### **III. THE SPECIFICATION OBJECTION SHOULD BE WITHDRAWN**

The specification stands objected to due to informalities. In light of the amendment to the specification, the withdrawal of this objection is respectfully requested.

### **IV. THE 35 U.S.C. § 112 REJECTION SHOULD BE WITHDRAWN**

Claims 15 and 16 stand rejected under 35 U.S.C. §112, second paragraph, for being indefinite. Specifically, the Examiner states that the preamble to these claims only claims a brushhead assembly portion and that the handle portion recited in the claim doesn't carry patentable weight since it is not positively recited in the preamble of the claims. (See 7/24/09 Office Action, p. 3). In light of the amendments to these claims, Applicant respectfully requests the withdrawal of this rejection.

### **V. THE 35 U.S.C. § 102(b) REJECTIONS SHOULD BE WITHDRAWN**

Claims 1-9 stand rejected under 35 U.S.C. §102(b) for being anticipated by Peot (U.S. Patent No. 4,777,393).

Claim 1 has been amended to recite, “A system for joining an appliance body having a driving assembly therein to a driven member assembly which includes a workpiece element having a torsional axis of movement, comprising:  
a plurality of joining assemblies removably attaching the driven member assembly to the appliance body, wherein the joining assemblies are each separate from the torsional axis of the workpiece element, wherein the joining assemblies each include a mating member on one of a) the appliance body and b) the driven member assembly and an associated receiving element on the other thereof, wherein the mating members and the receiving elements have such a configuration, respectively, and mate in such a manner that there is substantially no lost motion for the workpiece element during operation of the appliance and such that *the driven member assembly is readily removable from the appliance body upon application of an axial force, and wherein the mating of the mating members and the receiving members is an interference fit.*

Peot discloses a motor unit 10 attachable to a housing 132 by means of locking pin members 58. Peot discloses a spring actuated locking plate inside of housing 12 of motor unit 10, wherein the locking plate engages “the grooves provided in locking pin members 58.” (See col. 7, ll. 41-47). The Examiner refers to the locking pin members and their corresponding holes in the motor housing to meet the claimed mating members and receiving members, respectively. (See 7/24/09 Office Action, p. 4). Peot fails to provide details of how the locking plate engages these grooves. However, Applicant respectfully submits that regardless of how the locking plate engages the grooves in locking pin members 58, such a coupling is not *an interference fit*. Accordingly, Peot fails to disclose or suggest “*the mating of the mating members and the receiving members is an interference fit,*” as recited in claim 1. Thus, it is respectfully submitted that claim 1 and its dependent claims 2-9 are allowable over Peot.

Claims 10-16 stand rejected under 35 U.S.C. §102(b) for being anticipated by McDougall (U.S. Patent No. 5,617,601).

Claim 10 has been amended to recite, “An oral care appliance, comprising: an appliance body having a driving assembly therein; a driven member assembly which includes a workpiece element having a torsional axis of movement and wherein the workpiece element includes a brushhead; and a coupling structure for joining the appliance body to the driven member assembly, the coupling structure including a plurality of joining assemblies removably attaching the driven member assembly to the appliance body, wherein the joining assemblies are each separate from the torsional axis of the workpiece element, wherein each joining assembly includes a mating member from one of a) the appliance body or b) the driven member assembly and an associated receiving element in the other thereof, receiving said mating member, wherein the mating members and the receiving elements have such a configuration, respectively, and mate in such a manner that there is substantially no lost motion for the workpiece element during operation of the appliance, and such that *the driven member assembly is readily removable from the appliance body upon application of an axial force, and wherein the mating of the mating members and the receiving elements is an interference fit.*

McDougall discloses a pair of lugs 513 located on plug part 509. The pair of plugs 513 are inserted into grooves 515 and subsequently twisted into internal grooves 517. In order to attach plug part 509 and brush part 508, McDougall discloses that “after brush part 508 has been push-fitted onto the casing part 506, it must then be rotated through a quarter turn to bring these into proper alignment. During this rotation, the lugs 513 move in internal grooves 517, engaging behind shoulder 519 so that the brush part 508 cannot be pulled off the casing part 506.” (See McDougall, col. 4, ll. 59-67). The Examiner refers to the plugs and grooves 515 to meet the claimed mating members and receiving elements, respectively. (See 7/24/09 Office Action, p. 6). However, rotating the brush part to move the lugs into the internal grooves is significantly different from *an interference fit*. Therefore, Applicant respectfully submits that McDougall also fails to disclose or suggest “*the mating of the mating members and the receiving elements is an interference fit,*” as recited in claim 10 and that claim 10 is allowable. Because claims 11-14 depend on and, therefore, contain all of the limitations of claim 10, it is respectfully submitted that these claims are also allowable.

Claim 15 also recites, “*the mating of the mating members and the receiving elements is an interference fit.*” Applicant, therefore, respectfully submits that claim 15 and its dependent claim 16 are also allowable over McDougall for at least the foregoing reasons presented with regard claim 10.

**CONCLUSION**

In light of the foregoing, Applicant respectfully submits that all of the presently pending claims are in condition for allowance. All issues raised by the Examiner having been addressed, an early and favorable action on the merits is earnestly solicited.

Respectfully submitted,

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